

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CONGREGATION RABBINICAL COLLEGE OF
TARTIKOV, INC., RABBI MORDECHAI BABAD,
RABBI WOLF BRIEF, RABBI HERMEN KAHANA,
RABBI MEIR MARGULIS, RABBI GERGELY
NEUMAN, RABBI MEILECH MENCZER,
RABBI JACOB HERSHKOWITZ, RABBI
CHAIM ROSENBERG, RABBI DAVID A.
MENCZER, and RABBI ARYEH ROYDE,

Case No. 07-CV6304(KMK)

Plaintiffs,

-against-

VILLAGE OF POMONA, NY; BOARD OF TRUSTEES OF
THE VILLAGE OF POMONA, NY; SANDERSON,
AS MAYOR; IAN BANKS as Trustee and in his official capacity,
ALMA SANDERS ROMAN as Trustee and in her official capacity,
RITA LOUIE as Trustee and in her official capacity,
and BRETT YAGEL, as Trustee and in his official capacity,

Defendants.
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**DECLARATION OF PAUL SAVAD IN SUPPORT OF PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

PAUL SAVAD, an attorney duly admitted to the Bar of this State and this Court, declares
as follows, pursuant to 28 U.S.C. § 1746:

1. I am a member of Savad Churgin, attorneys for Plaintiffs Congregation Rabbinical
College of Tartikov, Inc. (the "Rabbinical College"), Rabbi Mordechai Babad, Rabbi Wolf Brief, Rabbi
Hermen Kahana, Rabbi Meir Margulis, Rabbi Meilech Menczer, Rabbi Jacob Hershkowitz, Rabbi Chaim
Rosenberg, and Rabbi David A. Menczer (collectively, the "Plaintiffs"). I submit this declaration in
support of Plaintiffs' Motion for Summary Judgment.

Deposition Transcripts

Depositions Taken By Plaintiffs:

2. Attached hereto as Exhibit 1 is a true and correct copy of the deposition of Melvin Cook, taken on April 8, 2014.

3. Attached hereto as Exhibit 2 is a true and correct copy of the deposition of Robert Prol, taken on April 9, 2014.

4. Attached hereto as Exhibit 3 is a true and correct copy of the deposition of Herbert Marshall, taken on April 30, 2014.

5. Attached hereto as Exhibit 4 is a true and correct copy of the deposition of Brett Yagel, taken on May 8, 2014.

6. Attached hereto as Exhibit 5 is a true and correct copy of the deposition of Alan Lamer, taken on May 12, 2014.

7. Attached hereto as Exhibit 6 is a true and correct copy of the deposition of Ian Banks, taken on May 15, 2014.

8. Attached hereto as Exhibit 7 is a true and correct copy of the deposition of Alma Roman, taken on May 16, 2014.

9. Attached hereto as Exhibit 8 is a true and correct copy of the deposition of Lynn Yagel, taken on May 22, 2014.

10. Attached hereto as Exhibit 9 is a true and correct copy of the deposition of Rita Louie, taken on June 16, 2014.

11. Attached hereto as Exhibit 10 is a true and correct copy of the deposition of Frederick P. Clark Associates, taken on June 20, 2014.

12. Attached hereto as Exhibit 11 is a true and correct copy of the deposition of Leslie Sanderson, taken on July 7, 2014.

13. Attached hereto as Exhibit 12 is a true and correct copy of Day 1 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 15, 2014.

14. Attached hereto as Exhibit 13 is a true and correct copy of Day 2 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 16, 2014.

15. Attached hereto as Exhibit 14 is a true and correct copy of Day 3 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 17, 2014.

16. Attached hereto as Exhibit 15 is a true and correct copy of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

17. Attached hereto as Exhibit 16 is a true and correct copy of the deposition of Preston Green, taken on July 7, 2014.

18. Attached hereto as Exhibit 17 is a true and correct copy of the deposition of Nicholas Sanderson, taken on July 31, 2014.

19. Attached hereto as Exhibit 18 is a true and correct copy of the deposition of Charles Voorhis, taken on August 1, 2014.

20. Attached hereto as Exhibit 19 is a true and correct copy of Day 1 of the deposition of Robert Rhodes, taken on August 11, 2014.

21. Attached hereto as Exhibit 20 is a true and correct copy of Day 2 of the deposition of Robert Rhodes, taken on August 12, 2014.

22. Attached hereto as Exhibit 21 is a true and correct copy of the deposition of Michael Castelluccio, taken on August 12, 2014.

23. Attached hereto as Exhibit 22 is a true and correct copy of the redirect deposition of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on August 15, 2014.

24. Attached hereto as Exhibit 23 is a true and correct copy of the deposition of Doris Ulman, taken on August 15, 2014.

25. Attached hereto as Exhibit 24 is a true and correct copy of the deposition of Mark Healey, taken on September 11, 2014.

Depositions Taken By Defendants:

26. Attached hereto as Exhibit 25 is a true and correct copy of the deposition of Chaim Rosenberg, taken on May 2, 2014.

27. Attached hereto as Exhibit 26 is a true and correct copy of the deposition of Meilech Menczer, taken on May 2, 2014.

28. Attached hereto as Exhibit 27 is a true and correct copy of the deposition of the 30 (b)(6) deposition of Plaintiff Congregation Rabbinical College of Tartikov, Inc., taken on May 5, 2014.

29. Attached hereto as Exhibit 28 is a true and correct copy of the deposition of Michael Tauber, taken on May 7, 2014.

30. Attached hereto as Exhibit 29 is a true and correct copy of the deposition of Mordechai Babad, taken on May 9, 2014.

31. Attached hereto as Exhibit 30 is a true and correct copy of the deposition of Jacob Hershkowitz, taken on May 13, 2014.

32. Attached hereto as Exhibit 31 is a true and correct copy of the deposition of Chaim Babad, taken on May 19, 2014.

33. Attached hereto as Exhibit 32 is a true and correct copy of the deposition of Susannah Drake, taken on June 23, 2014.

34. Attached hereto as Exhibit 33 is a true and correct copy of the deposition of Nathan Fromowitz, taken on June 25, 2014.

35. Attached hereto as Exhibit 34 is a true and correct copy of the deposition of Steven H. Resnicoff, taken on July 3, 2014.

36. Attached hereto as Exhibit 35 is a true and correct copy of the deposition of Alan Weinstein, taken on July 11, 2014.

37. Attached hereto as Exhibit 36 is a true and correct copy of the deposition of Sheftel Neuberger, taken on July 23, 2014.

38. Attached hereto as Exhibit 37 is a true and correct copy of the deposition of William FitzPatrick, taken on August 7, 2014.

39. Attached hereto as Exhibit 38 is a true and correct copy of the deposition of Leonard Jackson, taken on August 13, 2014.

Documents

40. Attached hereto as Exhibit 39 is a true and correct copy of a letter dated February 15, 2005 from Paul Savad, Esq., Re: Real Property Tax Grievance, which was previously marked a Plaintiffs' Exhibit No. 23 at the deposition of Melvin Cook on April 8, 2014.

41. Attached hereto as Exhibit 40 is a true and correct copy of an email dated March 26, 2007 from Nicholas Sanderson, which was previously marked as Plaintiffs' Exhibit No. 25 at the deposition of Melvin Cook on April 8, 2014.

42. Attached hereto as Exhibit 41 is a true and correct copy of a blow-up of a printout from LoHud.com dated May 8, 2007, which was previously marked as Plaintiffs' Exhibit No. 27 at the deposition of Melvin Cook on April 8, 2014.

43. Attached hereto as Exhibit 42 is a true and correct copy of a letter in the Journal News, dated May 4, 2008, by Melvin Cook, which was previously marked as Plaintiffs' Exhibit No. 29 at the deposition of Melvin Cook on April 8, 2014.

44. Attached hereto as Exhibit 43 is a true and correct copy of a letter in the Journal News, dated July 24, 2007, by Melvin Cook, which was previously marked as Plaintiffs' Exhibit No. 30 at the deposition of Melvin Cook on April 8, 2014.

45. Attached hereto as Exhibit 44 is a true and correct copy of a letter, original publication January 29, 2007, by Melvin Cook; and letter by Rachel Avenia-Prol, which was previously marked as Plaintiffs' Exhibit No. 31 at the deposition of Melvin Cook on April 8, 2014.

46. Attached hereto as Exhibit 45 is a true and correct copy of an email dated May 11, 2007, from Nicholas Sanderson, which was previously marked as Plaintiffs' Exhibit No. 34 at the deposition of Melvin Cook on April 8, 2014.

47. Attached hereto as Exhibit 46 is a true and correct copy of an email dated June 15, 2007, from Melvin Cook, which was previously marked as Plaintiffs' Exhibit No. 35 at the deposition of Melvin Cook on April 8, 2014.

48. Attached hereto as Exhibit 47 is a true and correct copy of an email dated July 12, 2007, from Melvin Cook, which was previously marked as Plaintiffs' Exhibit No. 36 at the deposition of Melvin Cook on April 8, 2014.

49. Attached hereto as Exhibit 48 is a true and correct copy of an email dated August 29, 2007, from Melvin Cook, which was previously marked as Plaintiffs' Exhibit No. 38 at the deposition of Melvin Cook on April 8, 2014.

50. Attached hereto as Exhibit 49 is a true and correct copy of a documents entitled "Draft Excerpts on Tartikov Letters", which was previously marked as Plaintiffs' Exhibit No. 39 at the deposition of Melvin Cook on April 8, 2014.

51. Attached hereto as Exhibit 50 is a true and correct copy of a letter (2 pages), which was previously marked as Plaintiffs' Exhibit No. 46 at the deposition of Melvin Cook on April 8, 2014.

52. Attached hereto as Exhibit 51 is a true and correct copy of emails (2 pages) which was previously marked as Plaintiffs' Exhibit No. 51 at the deposition of Robert Prol on April 9, 2014.

53. Attached hereto as Exhibit 52 is a true and correct copy of posting, which was previously marked as Plaintiffs' Exhibit No. 52 at the deposition of Robert Prol on April 9, 2014.

54. Attached hereto as Exhibit 53 is a true and correct copy of a printout from LoHud.com, which was previously marked as Plaintiffs' Exhibit No. 63 at the deposition of Robert Prol on April 9, 2014.

55. Attached hereto as Exhibit 54 is a true and correct copy of a printout from LoHud.com, which was previously marked as Plaintiffs' Exhibit No. 64 at the deposition of Robert Prol on April 9, 2014.

56. Attached hereto as Exhibit 55 is a true and correct copy of a printout from LoHud.com, which was previously marked as Plaintiffs' Exhibit No. 65 at the deposition of Robert Prol on April 9, 2014.

57. Attached hereto as Exhibit 56 is a true and correct copy of emails (4 pages), which was previously marked as Plaintiffs' Exhibit No. 66 at the deposition of Robert Prol on April 9, 2014.

58. Attached hereto as Exhibit 57 is a true and correct copy of an email, dated July 11, 2007, which was previously marked as Plaintiffs' Exhibit No. 68 at the deposition of Robert Prol on April 9, 2014.

59. Attached hereto as Exhibit 58 is a true and correct copy of emails (9 pages), which was previously marked as Plaintiffs' Exhibit No. 69 at the deposition of Robert Prol on April 9, 2014.

60. Attached hereto as Exhibit 59 is a true and correct copy of emails (3 pages), which was previously marked as Plaintiffs' Exhibit No. 72 at the deposition of Robert Prol on April 9, 2014.

61. Attached hereto as Exhibit 60 is a true and correct copy of a printout from LoHud.com, which was previously marked as Plaintiffs' Exhibit No. 74 at the deposition of Robert Prol on April 9, 2014.

62. Attached hereto as Exhibit 61 is a true and correct copy of a printout from LoHud.com, which was previously marked as Plaintiffs' Exhibit No. 80 at the deposition of Robert Prol on April 9, 2014.

63. Attached hereto as Exhibit 62 is a true and correct copy of a printout from LoHud.com, which was previously marked as Plaintiffs' Exhibit No. 81 at the deposition of Robert Prol on April 9, 2014.

64. Attached hereto as Exhibit 63 is a true and correct copy of Defendants' Objections and Responses to Documents Requested in Subpoena, which was previously marked as Plaintiffs' Exhibit No. 85 at the deposition of Herbert Marshall on April 30, 2014.

65. Attached hereto as Exhibit 64 is a true and correct copy of the Board of Trustees Minutes, dated December 18, 2000, which was previously marked as Plaintiffs' Exhibit No. 98 at the deposition of Herbert Marshall on April 30, 2014.

66. Attached hereto as Exhibit 65 is a true and correct copy of a letter, dated February 15, 2005, re: Grievance Application, which was previously marked as Plaintiffs' Exhibit No. 100 at the deposition of Herbert Marshall on April 30, 2014.

67. Attached hereto as Exhibit 66 is a true and correct copy of the Board of Trustees Meeting Minutes and Grievance Day Hearing, dated February 15, 2005, which was previously marked as Plaintiffs' Exhibit No. 102 at the deposition of Herbert Marshall on April 30, 2014.

68. Attached hereto as Exhibit 67 is a true and correct copy of an emails, dated August 16, 2006, which was previously marked as Plaintiffs' Exhibit No. 103 at the deposition of Herbert Marshall on April 30, 2014.

69. Attached hereto as Exhibit 68 is a true and correct copy of a Newsletter "The Village Green", dated October 2005, which was previously marked as Plaintiffs' Exhibit No. 105 at the deposition of Herbert Marshall on April 30, 2014.

70. Attached hereto as Exhibit 69 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 108 at the deposition of Herbert Marshall on April 30, 2014.

71. Attached hereto as Exhibit 70 is a true and correct copy of a Transmittal, dated December 10, 2002, with Board of Trustees Meeting November 25, 2002 Minutes, which was previously marked as Plaintiffs' Exhibit No. 109 at the deposition of Herbert Marshall on April 30, 2014.

72. Attached hereto as Exhibit 71 is a true and correct copy of the Board of Trustees Minutes, dated February 22, 1999, which was previously marked as Plaintiffs' Exhibit No. 111 at the deposition of Herbert Marshall on April 30, 2014.

73. Attached hereto as Exhibit 72 is a true and correct copy of a Newsletter "The Village Green", dated July 2004, which was previously marked as Plaintiffs' Exhibit No. 112 at the deposition of Herbert Marshall on April 30, 2014.

74. Attached hereto as Exhibit 73 is a true and correct copy of the Board of Trustees Minutes, dated April 28, 2003, which was previously marked as Plaintiffs' Exhibit No. 113 at the deposition of Herbert Marshall on April 30, 2014.

75. Attached hereto as Exhibit 74 is a true and correct copy of a document re: Local Law No. 1-2003, dated June 23, 2003, which was previously marked as Plaintiffs' Exhibit No. 114 at the deposition of Herbert Marshall on April 30, 2014.

76. Attached hereto as Exhibit 75 is a true and correct copy of a letter, dated June 11, 2004, which was previously marked as Plaintiffs' Exhibit No. 115 at the deposition of Herbert Marshall on April 30, 2014.

77. Attached hereto as Exhibit 76 is a true and correct copy of a Journal News article, dated February 21, 2007, which was previously marked as Plaintiffs' Exhibit No. 116 at the deposition of Herbert Marshall on April 30, 2014.

78. Attached hereto as Exhibit 77 is a true and correct copy of a Resolution of the Village of Pomona, dated February 12, 2007, which was previously marked as Plaintiffs' Exhibit No. 117 at the deposition of Herbert Marshall on April 30, 2014.

79. Attached hereto as Exhibit 78 is a true and correct copy of the Minutes of Public Hearing, Pomona Board of Trustees, dated January 22, 2007, which was previously marked as Plaintiffs' Exhibit No. 118 at the deposition of Herbert Marshall on April 30, 2014.

80. Attached hereto as Exhibit 79 is a true and correct copy of an email, dated February 12, 2007, which was previously marked as Plaintiffs' Exhibit No. 119 at the deposition of Herbert Marshall on April 30, 2014.

81. Attached hereto as Exhibit 80 is a true and correct copy of a letter, dated March 5, 2001, which was previously marked as Plaintiffs' Exhibit No. 123 at the deposition of Herbert Marshall on April 30, 2014.

82. Attached hereto as Exhibit 81 is a true and correct copy of an email, dated March 30, 2003, which was previously marked as Plaintiffs' Exhibit No. 125 at the deposition of Herbert Marshall on April 30, 2014.

83. Attached hereto as Exhibit 82 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 126 at the deposition of Herbert Marshall on April 30, 2014.

84. Attached hereto as Exhibit 83 is a true and correct copy of an email, dated January 9, 2007, which was previously marked as Plaintiffs' Exhibit No. 127 at the deposition of Herbert Marshall on April 30, 2014.

85. Attached hereto as Exhibit 84 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 128 at the deposition of Herbert Marshall on April 30, 2014.

86. Attached hereto as Exhibit 85 is a true and correct copy of the Minutes of a Board of Trustees Special Meeting on April 21, 2008, which was previously marked as Plaintiffs' Exhibit No. 135 at the deposition of Brett Yagel on May 8, 2014.

87. Attached hereto as Exhibit 86 is a true and correct copy of an email dated August 7, 2007, which was previously marked as Plaintiffs' Exhibit No. 136 at the deposition of Brett Yagel on May 8, 2014.

88. Attached hereto as Exhibit 87 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 137 at the deposition of Brett Yagel on May 8, 2014.

89. Attached hereto as Exhibit 88 is a true and correct copy of a pamphlet of a Village Community Party, which was previously marked as Plaintiffs' Exhibit No. 142 at the deposition of Brett Yagel on May 8, 2014.

90. Attached hereto as Exhibit 89 is a true and correct copy of an email dated August 3, 2007, which was previously marked as Plaintiffs' Exhibit No. 144 at the deposition of Brett Yagel on May 8, 2014

91. Attached hereto as Exhibit 90 is a true and correct copy of campaign literature, which was previously marked as Plaintiffs' Exhibit No. 147 at the deposition of Brett Yagel on May 8, 2014.

92. Attached hereto as Exhibit 91 is a true and correct copy of campaign literature which was previously marked as Plaintiffs' Exhibit No. 150 at the deposition of Brett Yagel on May 8, 2014.

93. Attached hereto as Exhibit 92 is a true and correct copy of a pamphlet of a Village Community Party, which was previously marked as Plaintiffs' Exhibit No. 152 at the deposition of Brett Yagel on May 8, 2014.

94. Attached hereto as Exhibit 93 is a true and correct copy of campaign literature, which was previously marked as Plaintiffs' Exhibit No. 153 at the deposition of Brett Yagel on May 8, 2014.

95. Attached hereto as Exhibit 94 is a true and correct copy of campaign literature, which was previously marked as Plaintiffs' Exhibit No. 155 at the deposition of Brett Yagel on May 8, 2014.

96. Attached hereto as Exhibit 95 is a true and correct copy of a campaign item, which was previously marked as Plaintiffs' Exhibit No. 159 at the deposition of Brett Yagel on May 8, 2014.

97. Attached hereto as Exhibit 96 is a true and correct copy of a Journal News article, dated April 2, 2007, which was previously marked as Plaintiffs' Exhibit No. 162 at the deposition of Brett Yagel on May 8, 2014.

98. Attached hereto as Exhibit 97 is a true and correct copy of a printout from LoHud.com, which was previously marked as Plaintiffs' Exhibit No. 163 at the deposition of Brett Yagel on May 8, 2014.

99. Attached hereto as Exhibit 98 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 164 at the deposition of Brett Yagel on May 8, 2014.

100. Attached hereto as Exhibit 99 is a true and correct copy of a Complaint form to the New York State Office of the Attorney General, Public Integrity Unit, which was previously marked as Plaintiffs' Exhibit No. 165 at the deposition of Brett Yagel on May 8, 2014.

101. Attached hereto as Exhibit 100 is a true and correct copy of an email, dated April 27, 2007, which was previously marked as Plaintiffs' Exhibit No. 166 at the deposition of Brett Yagel on May 8, 2014.

102. Attached hereto as Exhibit 101 is a true and correct copy of a document entitled "Community View-A Tale of Two Towns-One Divided", which was previously marked as Plaintiffs' Exhibit No. 167 at the deposition of Brett Yagel on May 8, 2014.

103. Attached hereto as Exhibit 102 is a true and correct copy of a document entitled "Another Example of Why Things Are Wrong in Ramapo", which was previously marked as Plaintiffs' Exhibit No. 168 at the deposition of Brett Yagel on May 8, 2014.

104. Attached hereto as Exhibit 103 is a true and correct copy of an email, dated April 7, 2007, which was previously marked as Plaintiffs' Exhibit No. 171 at the deposition of Brett Yagel on May 8, 2014.

105. Attached hereto as Exhibit 104 is a true and correct copy of an Affidavit In Opposition to Defendants' Motion to Dismiss, which was previously marked as Plaintiffs' Exhibit No. 173 at the deposition of Brett Yagel on May 8, 2014.

106. Attached hereto as Exhibit 105 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 174 at the deposition of Brett Yagel on May 8, 2014.

107. Attached hereto as Exhibit 106 is a true and correct copy of an email, dated February 25, 2007, which was previously marked as Plaintiffs' Exhibit No. 180 at the deposition of Brett Yagel on May 8, 2014.

108. Attached hereto as Exhibit 107 is a true and correct copy of a documents entitled "The Patrick Farm Sellout-Three Betrayals", which was previously marked as Plaintiffs' Exhibit No. 182 at the deposition of Brett Yagel on May 8, 2014.

109. Attached hereto as Exhibit 108 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 185 at the deposition of Brett Yagel on May 8, 2014.

110. Attached hereto as Exhibit 109 is a true and correct copy of a draft letter, which was previously marked as Plaintiffs' Exhibit No. 186 at the deposition of Brett Yagel on May 8, 2014.

111. Attached hereto as Exhibit 110 is a true and correct copy of an email, dated August 3, 2007, which was previously marked as Plaintiffs' Exhibit No. 188 at the deposition of Brett Yagel on May 8, 2014.

112. Attached hereto as Exhibit 111 is a true and correct copy of an email, dated February 15, 2007, which was previously marked as Plaintiffs' Exhibit No. 194 at the deposition of Brett Yagel on May 8, 2014.

113. Attached hereto as Exhibit 112 is a true and correct copy of an article entitled "Where Religion Meets Real Estate, a Developer and a Town Face Off", which was previously marked as Plaintiffs' Exhibit No. 195 at the deposition of Brett Yagel on May 8, 2014.

114. Attached hereto as Exhibit 113 is a true and correct copy of an article by Lynn Yagel, which was previously marked as Plaintiffs' Exhibit No. 196 at the deposition of Brett Yagel on May 8, 2014.

115. Attached hereto as Exhibit 114 is a true and correct copy of a draft email to the Journal News Editorial Page, which was previously marked as Plaintiffs' Exhibit No. 197 at the deposition of Brett Yagel on May 8, 2014.

116. Attached hereto as Exhibit 115 is a true and correct copy of a Memorandum, dated January 14, 2000, which was previously marked as Plaintiffs' Exhibit No. 201 at the deposition of Alan Lamer on May 12, 2014.

117. Attached hereto as Exhibit 116 is a true and correct copy of the Minutes of Public Hearing, Pomona Board of Trustees on January 22, 2007, which was previously marked as Plaintiffs' Exhibit No. 203 at the deposition of Alan Lamer on May 12, 2014.

118. Attached hereto as Exhibit 117 is a true and correct copy of Minutes of a Board of Trustees Workshop Tentative Working Edition on November 8, 2004, which was previously marked as Plaintiffs' Exhibit No. 206 at the deposition of Alan Lamer on May 12, 2014.

119. Attached hereto as Exhibit 118 is a true and correct copy of Minutes of a Board of Trustees Meeting on November 22, 2004Plaintiffs' Exhibit No. 207, which was previously marked at the deposition of Alan Lamer on May 12, 2014.

120. Attached hereto as Exhibit 119 is a true and correct copy of Corrected Minutes of a Board of Trustees Meeting on April 28, 1997, which was previously marked as Plaintiffs' Exhibit No. 214 at the deposition of Ian Banks on May 15, 2014.

121. Attached hereto as Exhibit 120 is a true and correct copy of Minutes of a Board of Trustees Meeting and Grievance Day Minutes on February 15, 2005, which was previously marked as Plaintiffs' Exhibit No. 216 at the deposition of Ian Banks on May 15, 2014.

122. Attached hereto as Exhibit 121 is a true and correct copy of an email, dated July 11, 2007, which was previously marked as Plaintiffs' Exhibit No. 219 at the deposition of Ian Banks on May 15, 2014.

123. Attached hereto as Exhibit 122 is a true and correct copy of a Newsletter "The Village Green", dated July 2004, which was previously marked as Plaintiffs' Exhibit No. 220 at the deposition of Ian Banks on May 15, 2014.

124. Attached hereto as Exhibit 123 is a true and correct copy of the Minutes of Public Hearing, Board of Trustees on January 22, 2007, which was previously marked as Plaintiffs' Exhibit No. 224 at the deposition of Ian Banks on May 15, 2014.

125. Attached hereto as Exhibit 124 is a true and correct copy of the Minutes of the Board of Trustees Meeting on March 27, 2006, which was previously marked as Plaintiffs' Exhibit No. 241 at the deposition of Alma Roman on May 16, 2014.

126. Attached hereto as Exhibit 125 is a true and correct copy of a printout of an article entitled "In a Town Divided, a Wispy Boundary Between Land Use and Religion", which was

previously marked as Plaintiffs' Exhibit No. 247 at the deposition of Lynn Yagel on May 22, 2014.

127. Attached hereto as Exhibit 126 is a true and correct copy of Plaintiffs' Exhibit No. 252, which was previously marked at the deposition of Lynn Yagel on May 22, 2014.

128. Attached hereto as Exhibit 127 is a true and correct copy of a flier re: "Benefit Cruise Along the Hudson", which was previously marked as Plaintiffs' Exhibit No. 253 at the deposition of Lynn Yagel on May 22, 2014.

129. Attached hereto as Exhibit 128 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 255 at the deposition of Lynn Yagel on May 22, 2014.

130. Attached hereto as Exhibit 129 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 256 at the deposition of Lynn Yagel on May 22, 2014.

131. Attached hereto as Exhibit 130 is a true and correct copy of an article entitled "Pomona Rabbinical College Not a 'Natural' Progression", which was previously marked as Plaintiffs' Exhibit No. 258 at the deposition of Lynn Yagel on May 22, 2014.

132. Attached hereto as Exhibit 131 is a true and correct copy of campaign literature re: Endorsement, which was previously marked as Plaintiffs' Exhibit No. 268 at the deposition of Rita Louie on June 16, 2014.

133. Attached hereto as Exhibit 132 is a true and correct copy of Plaintiffs' Exhibit No. 270, which was previously marked at the deposition of Rita Louie on June 16, 2014.

134. Attached hereto as Exhibit 133 is a true and correct copy of an email, dated March 17, 2007, which was previously marked as Plaintiffs' Exhibit No. 271 at the deposition of Rita Louie on June 16, 2014.

135. Attached hereto as Exhibit 134 is a true and correct copy of campaign literature, which was previously marked as Plaintiffs' Exhibit No. 275 at the deposition of Rita Louie on June 16, 2014.

136. Attached hereto as Exhibit 135 is a true and correct copy of an email, dated March 26, 2007, which was previously marked as Plaintiffs' Exhibit No. 277 at the deposition of Rita Louie on June 16, 2014.

137. Attached hereto as Exhibit 136 is a true and correct copy of campaign literature, which was previously marked as Plaintiffs' Exhibit No. 278 at the deposition of Rita Louie on June 16, 2014.

138. Attached hereto as Exhibit 137 is a true and correct copy of posting, which was previously marked as Plaintiffs' Exhibit No. 280 at the deposition of Rita Louie on June 16, 2014.

139. Attached hereto as Exhibit 138 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 282 at the deposition of Rita Louie on June 16, 2014.

140. Attached hereto as Exhibit 139 is a true and correct copy of, which was previously marked as emails Plaintiffs' Exhibit No. 284 at the deposition of Rita Louie on June 16, 2014.

141. Attached hereto as Exhibit 140 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 285 at the deposition of Rita Louie on June 16, 2014.

142. Attached hereto as Exhibit 141 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 288 at the deposition of Rita Louie on June 16, 2014.

143. Attached hereto as Exhibit 142 is a true and correct copy of an Affidavit in Opposition to Defendants' Motion to Dismiss, dated January 14, 2008, which was previously marked as Plaintiffs' Exhibit No. 297 at the deposition of Rita Louie on June 16, 2014.

144. Attached hereto as Exhibit 143 is a true and correct copy of an email dated February 25, 2007, which was previously marked as Plaintiffs' Exhibit No. 298 at the deposition of Rita Louie on June 16, 2014.

145. Attached hereto as Exhibit 144 is a true and correct copy of an email dated July 30, 2013, which was previously marked as Plaintiffs' Exhibit No. 299 at the deposition of Rita Louie on June 16, 2014.

146. Attached hereto as Exhibit 145 is a true and correct copy of an email, dated February 25, 2007, which was previously marked as Plaintiffs' Exhibit No. 300 at the deposition of Rita Louie on June 16, 2014.

147. Attached hereto as Exhibit 146 is a true and correct copy of Plaintiffs' Exhibit No. 302, which was previously marked at the deposition of Rita Louie on June 16, 2014.

148. Attached hereto as Exhibit 147 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 303 at the deposition of Rita Louie on June 16, 2014.

149. Attached hereto as Exhibit 148 is a true and correct copy of, which was previously marked as emails Plaintiffs' Exhibit No. 304 at the deposition of Rita Louie on June 16, 2014.

150. Attached hereto as Exhibit 149 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 305 at the deposition of Rita Louie on June 16, 2014.

151. Attached hereto as Exhibit 150 is a true and correct copy of an article written to the Journal News Editorial Page, which was previously marked as Plaintiffs' Exhibit No. 306 at the deposition of Rita Louie on June 16, 2014.

152. Attached hereto as Exhibit 151 is a true and correct copy of the Village of Pomona Master Plan, which was previously marked as Plaintiffs' Exhibit No. 313 at the deposition of Frederick P. Clark Associates on June 20, 2014.

153. Attached hereto as Exhibit 152 is a true and correct copy of a Local Law Filing, which was previously marked as Plaintiffs' Exhibit No. 314 at the deposition of Frederick P. Clark Associates on June 20, 2014.

154. Attached hereto as Exhibit 153 is a true and correct copy of the Minutes of the Planning Board Meeting on December 15, 1999, which was previously marked as Plaintiffs' Exhibit No. 316 at the deposition of Frederick P. Clark Associates on June 20, 2014.

155. Attached hereto as Exhibit 154 is a true and correct copy of the Village Code Chapter 126: Wetlands, which was previously marked as Plaintiffs' Exhibit No. 326 at the deposition of Frederick P. Clark Associates on June 20, 2014.

156. Attached hereto as Exhibit 155 is a true and correct copy of a memo from the Village of Pomona to Frederick P. Clark Associates, which was previously marked as Plaintiffs' Exhibit No. 328 at the deposition of Frederick P. Clark Associates on June 20, 2014.

157. Attached hereto as Exhibit 156 is a true and correct copy of a letter of transmittal dated January 8, 1999, which was previously marked as Plaintiffs' Exhibit No. 329 at the deposition of Frederick P. Clark Associates on June 20, 2014.

158. Attached hereto as Exhibit 157 is a true and correct copy of a memo to the Village of Pomona, dated June 11, 2009, which was previously marked as Plaintiffs' Exhibit No. 330 at the deposition of Frederick P. Clark Associates on June 20, 2014.

159. Attached hereto as Exhibit 158 is a true and correct copy of a memo to the Village of Pomona, dated June 11, 2009, which was previously marked as Plaintiffs' Exhibit No. 331 at the deposition of Frederick P. Clark Associates on June 20, 2014.

160. Attached hereto as Exhibit 159 is a true and correct copy of a memo to Mark Healy from Charlie Benton, dated September 15, 2000, which was previously marked as Plaintiffs' Exhibit No. 332 at the deposition of Frederick P. Clark Associates on June 20, 2014.

161. Attached hereto as Exhibit 160 is a true and correct copy of a memo to Mark Healy from Charlie Benton, dated January 15, 2001, which was previously marked as Plaintiffs' Exhibit No. 333 at the deposition of Frederick P. Clark Associates on June 20, 2014.

162. Attached hereto as Exhibit 161 is a true and correct copy of notes from a November 16, 2012 conversation, which was previously marked as Plaintiffs' Exhibit No. 334 at the deposition of Frederick P. Clark Associates on June 20, 2014.

163. Attached hereto as Exhibit 162 is a true and correct copy of a Memorandum to the Village of Pomona Planning Board, dated July 16, 2008, which was previously marked as Plaintiffs' Exhibit No. 335 at the deposition of Frederick P. Clark Associates on June 20, 2014.

164. Attached hereto as Exhibit 163 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 336 at the deposition of Leslie Sanderson on July 7, 2014.

165. Attached hereto as Exhibit 164 is a true and correct copy of a Meeting Announcement, which was previously marked as Plaintiffs' Exhibit No. 337 at the deposition of Leslie Sanderson on July 7, 2014.

166. Attached hereto as Exhibit 165 is a true and correct copy of an article entitled "Culture Clash", which was previously marked as Plaintiff's Exhibit No. 340 at the deposition of Leslie Sanderson on July 7, 2014.

167. Attached hereto as Exhibit 166 is a true and correct copy of a list of written correspondence, which was previously marked as Plaintiffs' Exhibit No. 345 at the deposition of Leslie Sanderson on July 7, 2014.

168. Attached hereto as Exhibit 167 is a true and correct copy of an email, dated June 8, 2009, which was previously marked as Plaintiffs' Exhibit No. 348 at the deposition of Leslie Sanderson on July 7, 2014.

169. Attached hereto as Exhibit 168 is a true and correct copy of an email, dated August 16, 2006, which was previously marked as Plaintiffs' Exhibit No. 351 at the deposition of Leslie Sanderson on July 7, 2014.

170. Attached hereto as Exhibit 169 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 352 at the deposition of Leslie Sanderson on July 7, 2014.

171. Attached hereto as Exhibit 170 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 353 at the deposition of Leslie Sanderson on July 7, 2014.

172. Attached hereto as Exhibit 171 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 354 at the deposition of Leslie Sanderson on July 7, 2014.

173. Attached hereto as Exhibit 172 is a true and correct copy of an email, dated May 16, 2007, which was previously marked as Plaintiffs' Exhibit No. 355 at the deposition of Leslie Sanderson on July 7, 2014.

174. Attached hereto as Exhibit 173 is a true and correct copy of a notice of deposition of the Village of Pomona, which was previously marked as Plaintiffs' Exhibit No. 357 at the deposition of Day 1 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 15, 2014.

175. Attached hereto as Exhibit 174 is a true and correct copy of a notice of deposition of the Board of Trustees, which was previously marked as Plaintiffs' Exhibit No. 358 at the deposition of Day 1 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 15, 2014.

176. Attached hereto as Exhibit 175 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 367 at the deposition of Day 2 of the 30 (b)(6)

deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 16, 2014.

177. Attached hereto as Exhibit 176 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 371 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

178. Attached hereto as Exhibit 177 is a true and correct copy of document, which was previously marked as Plaintiffs' Exhibit No. 384 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

179. Attached hereto as Exhibit 178 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 385 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

180. Attached hereto as Exhibit 179 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 390 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

181. Attached hereto as Exhibit 180 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 391 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

182. Attached hereto as Exhibit 181 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 392 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

183. Attached hereto as Exhibit 182 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 393 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

184. Attached hereto as Exhibit 183 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 403 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

185. Attached hereto as Exhibit 184 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 404 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

186. Attached hereto as Exhibit 185 is a true and correct copy of document, which was previously marked as Plaintiffs' Exhibit No. 407 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

187. Attached hereto as Exhibit 186 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 408 at the deposition of Day 4 of the 30 (b)(6)

deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

188. Attached hereto as Exhibit 187 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 409 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

189. Attached hereto as Exhibit 188 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 410 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

190. Attached hereto as Exhibit 189 is a true and correct copy of a Village of Pomona Green Article dated February 1999, which was previously marked as Plaintiffs' Exhibit No. 411 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

191. Attached hereto as Exhibit 190 is a true and correct copy of a document , which was previously marked as Plaintiffs' Exhibit No. 412 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

192. Attached hereto as Exhibit 191 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 414 at the deposition of Day 4 of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on July 18, 2014.

193. Attached hereto as Exhibit 192 is a true and correct copy of a two paged document, which was previously marked as Plaintiffs' Exhibit No. 452 at the deposition of Preston Green on July 30, 2014.

194. Attached hereto as Exhibit 193 is a true and correct copy of a five paged document, which was previously marked as Plaintiffs' Exhibit No. 453 at the deposition of Preston Green on July 30, 2014.

195. Attached hereto as Exhibit 194 is a true and correct copy of a ten paged document, which was previously marked as Plaintiffs' Exhibit No. 454 at the deposition of Preston Green on July 30, 2014.

196. Attached hereto as Exhibit 195 is a true and correct copy of a Savad Churgin letter enclosing a reply expert report of Prof. Kevin Kinser, which was previously marked as Plaintiffs' Exhibit No. 455 at the deposition of Preston Green on July 30, 2014.

197. Attached hereto as Exhibit 196 is a true and correct copy of a memo dated January 24, 2000, which was previously marked as Plaintiffs' Exhibit No. 459 at the deposition of Nicholas Sanderson on July 31, 2014.

198. Attached hereto as Exhibit 197 is a true and correct copy of the Corrected Minutes of the Board of Trustees Meeting dated March 22, 2004, which was previously marked as Plaintiffs' Exhibit No. 462 at the deposition of Nicholas Sanderson on July 31, 2014.

199. Attached hereto as Exhibit 198 is a true and correct copy of an email, dated November 4, 2005, which was previously marked as Plaintiffs' Exhibit No. 465 at the deposition of Nicholas Sanderson on July 31, 2014.

200. Attached hereto as Exhibit 199 is a true and correct copy of the Minutes of the Board of Trustees Meeting and Workshop, dated June 14, 2004, which was previously marked as Plaintiffs' Exhibit No. 466 at the deposition of Nicholas Sanderson on July 31, 2014.

201. Attached hereto as Exhibit 200 is a true and correct copy of a letter, dated February 15, 2008, with attachments, which was previously marked as Plaintiffs' Exhibit No. 468 at the deposition of Nicholas Sanderson on July 31, 2014.

202. Attached hereto as Exhibit 201 is a true and correct copy of an email dated January 9, 2007, which was previously marked as Plaintiffs' Exhibit No. 470 at the deposition of Nicholas Sanderson on July 31, 2014.

203. Attached hereto as Exhibit 202 is a true and correct copy of an email dated May 11, 2007, which was previously marked as Plaintiffs' Exhibit No. 472 at the deposition of Nicholas Sanderson on July 31, 2014.

204. Attached hereto as Exhibit 203 is a true and correct copy of an email dated May 14, 2007, which was previously marked as Plaintiffs' Exhibit No. 473 at the deposition of Nicholas Sanderson on July 31, 2014.

205. Attached hereto as Exhibit 204 is a true and correct copy of an email dated August 7, 2007, which was previously marked as Plaintiffs' Exhibit No. 474 at the deposition of Nicholas Sanderson on July 31, 2014.

206. Attached hereto as Exhibit 205 is a true and correct copy of an email dated March 6, 2007, which was previously marked as Plaintiffs' Exhibit No. 476 at the deposition of Nicholas Sanderson on July 31, 2014.

207. Attached hereto as Exhibit 206 is a true and correct copy of a one paged document, which was previously marked as Plaintiffs' Exhibit No. 477 at the deposition of Nicholas Sanderson on July 31, 2014.

208. Attached hereto as Exhibit 207 is a true and correct copy of an Endorsement, which was previously marked as Plaintiffs' Exhibit No. 478 at the deposition of Nicholas Sanderson on July 31, 2014.

209. Attached hereto as Exhibit 208 is a true and correct copy of an email dated November 8, 2005, which was previously marked as Plaintiffs' Exhibit No. 479 at the deposition of Nicholas Sanderson on July 31, 2014.

210. Attached hereto as Exhibit 209 is a true and correct copy of an email dated July 16, 2007, which was previously marked as Plaintiffs' Exhibit No. 480 at the deposition of Nicholas Sanderson on July 31, 2014.

211. Attached hereto as Exhibit 210 is a true and correct copy of an email dated March 26, 2007, which was previously marked as Plaintiffs' Exhibit No. 482 at the deposition of Nicholas Sanderson on July 31, 2014.

212. Attached hereto as Exhibit 211 is a true and correct copy of a fax cover sheet dated May 3, 2007 with an attachment, which was previously marked as Plaintiffs' Exhibit No. 483 at the deposition of Nicholas Sanderson on July 31, 2014.

213. Attached hereto as Exhibit 212 is a true and correct copy of a letter dated June 22, 2007, which was previously marked as Plaintiffs' Exhibit No. 484 at the deposition of Nicholas Sanderson on July 31, 2014.

214. Attached hereto as Exhibit 213 is a true and correct copy of a letter dated July 3, 2007, which was previously marked as Plaintiffs' Exhibit No. 485 at the deposition of Nicholas Sanderson on July 31, 2014.

215. Attached hereto as Exhibit 214 is a true and correct copy of an email dated May 11, 2007, which was previously marked as Plaintiffs' Exhibit No. 486 at the deposition of Nicholas Sanderson on July 31, 2014.

216. Attached hereto as Exhibit 215 is a true and correct copy of a two paged document, which was previously marked as Plaintiffs' Exhibit No. 487 at the deposition of Nicholas Sanderson on July 31, 2014.

217. Attached hereto as Exhibit 216 is a true and correct copy of an email dated August 3, 2007, which was previously marked as Plaintiffs' Exhibit No. 488 at the deposition of Nicholas Sanderson on July 31, 2014.

218. Attached hereto as Exhibit 217 is a true and correct copy of a one paged document, which was previously marked as Plaintiffs' Exhibit No. 489 at the deposition of Nicholas Sanderson on July 31, 2014.

219. Attached hereto as Exhibit 218 is a true and correct copy of a two paged document, which was previously marked as Plaintiffs' Exhibit No. 490 at the deposition of Nicholas Sanderson on July 31, 2014.

220. Attached hereto as Exhibit 219 is a true and correct copy of a one paged document, which was previously marked as Plaintiffs' Exhibit No. 492 at the deposition of Nicholas Sanderson on July 31, 2014.

221. Attached hereto as Exhibit 220 is a true and correct copy of a two paged document, which was previously marked as Plaintiffs' Exhibit No. 494 at the deposition of Nicholas Sanderson on July 31, 2014.

222. Attached hereto as Exhibit 221 is a true and correct copy of a five paged document, which was previously marked as Plaintiffs' Exhibit No. 495 at the deposition of Nicholas Sanderson on July 31, 2014.

223. Attached hereto as Exhibit 222 is a true and correct copy of a one paged document, which was previously marked as Plaintiffs' Exhibit No. 496 at the deposition of Nicholas Sanderson on July 31, 2014.

224. Attached hereto as Exhibit 223 is a true and correct copy of an email dated March 28, 2007, which was previously marked as Plaintiffs' Exhibit No. 497 at the deposition of Nicholas Sanderson on July 31, 2014.

225. Attached hereto as Exhibit 224 is a true and correct copy of an email dated January 24, 2010, which was previously marked as Plaintiffs' Exhibit No. 498 at the deposition of Nicholas Sanderson on July 31, 2014.

226. Attached hereto as Exhibit 225 is a true and correct copy of the Minutes of the Board of Trustees Special Meeting, dated April 12, 2007, which was previously marked as Plaintiffs' Exhibit No. 499 at the deposition of Nicholas Sanderson on July 31, 2014.

227. Attached hereto as Exhibit 226 is a true and correct copy of a Statement of Joseph Meyers to the County Legislature dated January 16, 2007, which was previously marked as Plaintiffs' Exhibit No. 500 at the deposition of Nicholas Sanderson on July 31, 2014.

228. Attached hereto as Exhibit 227 is a true and correct copy of a file entitled “Resolutions 2002”, which was previously marked as Plaintiffs’ Exhibit No. 502 at the deposition of Nicholas Sanderson on July 31, 2014.

229. Attached hereto as Exhibit 228 is a true and correct copy of the Minutes of the Board of Trustees Meeting, dated February 12, 2007, which was previously marked as Plaintiffs’ Exhibit No. 504 at the deposition of Nicholas Sanderson on July 31, 2014.

230. Attached hereto as Exhibit 229 is a true and correct copy of a one paged document dated February 12, 2007, which was previously marked as Plaintiffs’ Exhibit No. 505 at the deposition of Nicholas Sanderson on July 31, 2014.

231. Attached hereto as Exhibit 230 is a true and correct copy of a letter dated March 26, 2007 with attachments, which was previously marked as Plaintiffs’ Exhibit No. 506 at the deposition of Nicholas Sanderson on July 31, 2014.

232. Attached hereto as Exhibit 231 is a true and correct copy of an email dated April 27, 2007, which was previously marked as Plaintiffs’ Exhibit No. 507 at the deposition of Nicholas Sanderson on July 31, 2014.

233. Attached hereto as Exhibit 232 is a true and correct copy of an email dated April 26, 2007, which was previously marked as Plaintiffs’ Exhibit No. 508 at the deposition of Nicholas Sanderson on July 31, 2014.

234. Attached hereto as Exhibit 233 is a true and correct copy of an email dated August 1, 2007, which was previously marked as Plaintiffs’ Exhibit No. 509 at the deposition of Nicholas Sanderson on July 31, 2014.

235. Attached hereto as Exhibit 234 is a true and correct copy of an email dated November 6, 2006, which was previously marked as Plaintiffs' Exhibit No. 513 at the deposition of Nicholas Sanderson on July 31, 2014.

236. Attached hereto as Exhibit 235 is a true and correct copy of an email dated July 17, 2007, which was previously marked as Plaintiffs' Exhibit No. 514 at the deposition of Nicholas Sanderson on July 31, 2014.

237. Attached hereto as Exhibit 236 is a true and correct copy of an email dated May 16, 2007, which was previously marked as Plaintiffs' Exhibit No. 516 at the deposition of Nicholas Sanderson on July 31, 2014.

238. Attached hereto as Exhibit 237 is a true and correct copy of an email dated May 16, 2007, which was previously marked as Plaintiffs' Exhibit No. 517 at the deposition of Nicholas Sanderson on July 31, 2014.

239. Attached hereto as Exhibit 238 is a true and correct copy of an email dated May 21, 2007, which was previously marked as Plaintiffs' Exhibit No. 518 at the deposition of Nicholas Sanderson on July 31, 2014.

240. Attached hereto as Exhibit 239 is a true and correct copy of an Affidavit in Opposition to Defendants' Motion to Dismiss dated January 14, 2008, which was previously marked as Plaintiffs' Exhibit No. 519 at the deposition of Nicholas Sanderson on July 31, 2014.

241. Attached hereto as Exhibit 240 is a true and correct copy of a four paged newsletter dated April 2007, which was previously marked as Plaintiffs' Exhibit No. 525 at the deposition of Nicholas Sanderson on July 31, 2014.

242. Attached hereto as Exhibit 241 is a true and correct copy of an email dated July 31, 2007, which was previously marked as Plaintiffs' Exhibit No. 529 at the deposition of Nicholas Sanderson on July 31, 2014.

243. Attached hereto as Exhibit 242 is a true and correct copy of an email dated July 11, 2007, which was previously marked as Plaintiffs' Exhibit No. 532 at the deposition of Nicholas Sanderson on July 31, 2014.

244. Attached hereto as Exhibit 243 is a true and correct copy of an email dated August 31, 2007, which was previously marked as Plaintiffs' Exhibit No. 533 at the deposition of Nicholas Sanderson on July 31, 2014.

245. Attached hereto as Exhibit 244 is a true and correct copy of an email dated April 11, 2007, which was previously marked as Plaintiffs' Exhibit No. 536 at the deposition of Nicholas Sanderson on July 31, 2014.

246. Attached hereto as Exhibit 245 is a true and correct copy of an email dated January 23, 2007, which was previously marked as Plaintiffs' Exhibit No. 537 at the deposition of Nicholas Sanderson on July 31, 2014.

247. Attached hereto as Exhibit 246 is a true and correct copy of an email dated February 15, 2007, which was previously marked as Plaintiffs' Exhibit No. 538 at the deposition of Nicholas Sanderson on July 31, 2014.

248. Attached hereto as Exhibit 247 is a true and correct copy of a six paged article dated March 16, 2007, which was previously marked as Plaintiffs' Exhibit No. 539 at the deposition of Nicholas Sanderson on July 31, 2014.

249. Attached hereto as Exhibit 248 is a true and correct copy of a printout from the Carole Novick Real Estate website, which was previously marked as Plaintiffs' Exhibit No. 545 at the deposition of Charles Voorhis on August 1, 2014.

250. Attached hereto as Exhibit 249 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 634 at Day 2 of the deposition of Robert Rhodes, taken on August 12, 2014.

251. Attached hereto as Exhibit 250 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 638 at Day 2 of the deposition of Robert Rhodes, taken on August 12, 2014.

252. Attached hereto as Exhibit 251 is a true and correct copy of an email dated February 15, 2007, which was previously marked as Plaintiffs' Exhibit No. 656 at Day 2 of the deposition of Robert Rhodes, taken on August 12, 2014.

253. Attached hereto as Exhibit 252 is a true and correct copy of an Editorial in the Journal Newspaper, which was previously marked as Plaintiffs' Exhibit No. 659 at Day 2 of the deposition of Robert Rhodes, taken on August 12, 2014.

254. Attached hereto as Exhibit 253 is a true and correct copy of an email dated January 12, 2007, which was previously marked as Plaintiffs' Exhibit No. 663 at Day 2 of the deposition of Robert Rhodes, taken on August 12, 2014.

255. Attached hereto as Exhibit 254 is a true and correct copy of a Statement of Robert I. Rhodes, which was previously marked as Plaintiffs' Exhibit No. 667 at Day 2 of the deposition of Robert Rhodes, taken on August 12, 2014.

256. Attached hereto as Exhibit 255 is a true and correct copy of an email dated September 18, 2006, which was previously marked as Plaintiffs' Exhibit No. 673 at Day 2 of the deposition of Robert Rhodes, taken on August 12, 2014.

257. Attached hereto as Exhibit 256 is a true and correct copy of a posting, which was previously marked as Plaintiffs' Exhibit No. 682 at the deposition of Michael Castelluccio, taken on August 12, 2014.

258. Attached hereto as Exhibit 257 is a true and correct copy of a document entitled "Christopher St. Lawrence and RLUIPA", which was previously marked as Plaintiffs' Exhibit No. 683 at the deposition of Michael Castelluccio, taken on August 12, 2014.

259. Attached hereto as Exhibit 258 is a true and correct copy of an email dated January 14, 2007, which was previously marked as Plaintiffs' Exhibit No. 691 at the deposition of Michael Castelluccio, taken on August 12, 2014.

260. Attached hereto as Exhibit 259 is a true and correct copy of emails, which was previously marked as Plaintiffs' Exhibit No. 692 at the deposition of Michael Castelluccio, taken on August 12, 2014.

261. Attached hereto as Exhibit 260 is a true and correct copy of an email dated January 28, 2007, which was previously marked as Plaintiffs' Exhibit No. 694 at the deposition of Michael Castelluccio, taken on August 12, 2014.

262. Attached hereto as Exhibit 261 is a true and correct copy of letters to various politicians, which was previously marked as Plaintiffs' Exhibit No. 698 at the deposition of Michael Castelluccio, taken on August 12, 2014.

263. Attached hereto as Exhibit 262 is a true and correct copy of an email dated March 3, 2007, which was previously marked as Plaintiffs' Exhibit No. 699 at the deposition of Michael Castelluccio, taken on August 12, 2014.

264. Attached hereto as Exhibit 263 is a true and correct copy of an email dated April 29, 2007, which was previously marked as Plaintiffs' Exhibit No. 700 at the deposition of Michael Castelluccio, taken on August 12, 2014.

265. Attached hereto as Exhibit 264 is a true and correct copy of an email dated May 20, 2007, which was previously marked as Plaintiffs' Exhibit No. 701 at the deposition of Michael Castelluccio, taken on August 12, 2014.

266. Attached hereto as Exhibit 265 is a true and correct copy of an email dated May 27, 2007, which was previously marked as Plaintiffs' Exhibit No. 702 at the deposition of Michael Castelluccio, taken on August 12, 2014.

267. Attached hereto as Exhibit 266 is a true and correct copy of an email dated July 2, 2007, which was previously marked as Plaintiffs' Exhibit No. 703 at the deposition of Michael Castelluccio, taken on August 12, 2014.

268. Attached hereto as Exhibit 267 is a true and correct copy of an email dated July 16, 2007, which was previously marked as Plaintiffs' Exhibit No. 704 at the deposition of Michael Castelluccio, taken on August 12, 2014.

269. Attached hereto as Exhibit 268 is a true and correct copy of an email dated August 6, 2007, which was previously marked as Plaintiffs' Exhibit No. 705 at the deposition of Michael Castelluccio, taken on August 12, 2014.

270. Attached hereto as Exhibit 269 is a true and correct copy of an email dated September 4, 2007, which was previously marked as Plaintiffs' Exhibit No. 706 at the deposition of Michael Castelluccio, taken on August 12, 2014.

271. Attached hereto as Exhibit 270 is a true and correct copy of an email dated September 19, 2007, which was previously marked as Plaintiffs' Exhibit No. 707 at the deposition of Michael Castelluccio, taken on August 12, 2014.

272. Attached hereto as Exhibit 271 is a true and correct copy of an email dated November 30, 2007, which was previously marked as Plaintiffs' Exhibit No. 708 at the deposition of Michael Castelluccio, taken on August 12, 2014.

273. Attached hereto as Exhibit 272 is a true and correct copy of an email dated April 22, 2008, which was previously marked as Plaintiffs' Exhibit No. 710 at the deposition of Michael Castelluccio, taken on August 12, 2014.

274. Attached hereto as Exhibit 273 is a true and correct copy of an email dated May 18, 2008, which was previously marked as Plaintiffs' Exhibit No. 711 at the deposition of Michael Castelluccio, taken on August 12, 2014.

275. Attached hereto as Exhibit 274 is a true and correct copy of an email dated June 29, 2008, which was previously marked as Plaintiffs' Exhibit No. 712 at the deposition of Michael Castelluccio, taken on August 12, 2014.

276. Attached hereto as Exhibit 275 is a true and correct copy of an email dated June 12, 2009, which was previously marked as Plaintiffs' Exhibit No. 713 at the deposition of Michael Castelluccio, taken on August 12, 2014.

277. Attached hereto as Exhibit 276 is a true and correct copy of an email dated February 3, 2010, which was previously marked as Plaintiffs' Exhibit No. 714 at the deposition of Michael Castelluccio, taken on August 12, 2014.

278. Attached hereto as Exhibit 277 is a true and correct copy of an email dated March 2, 2010, which was previously marked as Plaintiffs' Exhibit No. 715 at the deposition of Michael Castelluccio, taken on August 12, 2014.

279. Attached hereto as Exhibit 278 is a true and correct copy of Responses to Unanswered 30(b)(6) Questions, which was previously marked as Plaintiffs' Exhibit No. 800 at the redirect deposition of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on August 15, 2014.

280. Attached hereto as Exhibit 279 is a true and correct copy of a Map of the Village of Pomona, which was previously marked as Plaintiffs' Exhibit No. 801 at the redirect deposition of the 30 (b)(6) deposition of Defendants the Village of Pomona and the Village Board of Pomona, taken on August 15, 2014.

281. Attached hereto as Exhibit 280 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 802 at the deposition of Doris Ulman, taken on August 15, 2014.

282. Attached hereto as Exhibit 281 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 806 at the deposition of Doris Ulman, taken on August 15, 2014.

283. Attached hereto as Exhibit 282 is a true and correct copy of a document entitled "Village of Pomona Audio Tapes: 1 of 4", which was previously marked as Plaintiffs' Exhibit No. 807 at the deposition of Doris Ulman, taken on August 15, 2014.

284. Attached hereto as Exhibit 283 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 808 at the deposition of Doris Ulman, taken on August 15, 2014.

285. Attached hereto as Exhibit 284 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 809 at the deposition of Doris Ulman, taken on August 15, 2014.

286. Attached hereto as Exhibit 285 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 811 at the deposition of Doris Ulman, taken on August 15, 2014.

287. Attached hereto as Exhibit 286 is a true and correct copy of a document, which was previously marked as Plaintiffs' Exhibit No. 812 at the deposition of Doris Ulman, taken on August 15, 2014.

288. Attached hereto as Exhibit 287 is a true and correct copy of a letter dated March 28, 2007, which was previously marked as Plaintiffs' Exhibit No. 816 at the deposition of Doris Ulman, taken on August 15, 2014.

289. Attached hereto as Exhibit 288 is a true and correct copy of Defendants' Exhibit No. 3, which was previously marked at the deposition of the 30 (b)(6) deposition of Plaintiff Congregation Rabbinical College of Tartikov, Inc., taken on May 5, 2014.

290. Attached hereto as Exhibit 289 is a true and correct copy of Defendants' Exhibit No. 4, which was previously marked at the deposition of the 30 (b)(6) deposition of Plaintiff Congregation Rabbinical College of Tartikov, Inc., taken on May 5, 2014.

291. Attached hereto as Exhibit 290 is a true and correct copy of Defendants' Exhibit No. 8, which was previously marked at the deposition of the 30 (b)(6) deposition of Plaintiff Congregation Rabbinical College of Tartikov, Inc., taken on May 5, 2014.

292. Attached hereto as Exhibit 291 is a true and correct copy of Defendants' Exhibit No. 10, which was previously marked at the deposition of Michael Tauber taken on May 7, 2014.

293. Attached hereto as Exhibit 292 is a true and correct copy of Defendants' Exhibit No. 17, which was previously marked at the deposition of Jacob Hershkowitz taken on May 13, 2014.

294. Attached hereto as Exhibit 293 is a true and correct copy of Defendants' Exhibit No. 500, which was previously marked at the deposition of Leonard Jackson taken on August 13, 2014.

295. Attached hereto as Exhibit 294 is a true and correct copy of Defendants' Exhibit No. 501, which was previously marked at the deposition of Leonard Jackson taken on August 13, 2014.

296. Attached hereto as Exhibit 295 is a true and correct copy of Defendants' Exhibit No. 503, which was previously marked at the deposition of Leonard Jackson taken on August 13, 2014.

297. Attached hereto as Exhibit 296 is a true and correct copy of the Minutes of the Board of Trustees Meeting on December 18, 2006, which was previously produced by the Defendants to the Plaintiffs.

298. Attached hereto as Exhibit 297 is a true and correct copy of a Newsletter "The Village Green", dated March 2004, which was previously produced by the Defendants to the Plaintiffs.

299. Attached hereto as Exhibit 298 is a true and correct copy of a proposed Local Law amending the Code of the Village with respect to Wetland Protection, drafted December 11, 2006, which was previously produced by the Defendants to the Plaintiffs.

300. Attached hereto as Exhibit 299 is a true and correct copy of the Minutes of the Joint Board Meeting on June 27, 2005, which was previously produced by the Defendants to the Plaintiffs.

301. Attached hereto as Exhibit 300 is a true and correct copy of a proposed Local Law amending the Code of the Village with respect to Wetland Protection, drafted December 11, 2006, which was previously produced by the Defendants to the Plaintiffs.

302. Attached hereto as Exhibit 301 is a true and correct copy of the Minutes of the Board of Trustees Meeting on November 27, 2006, which was previously produced by the Defendants to the Plaintiffs.

303. Attached hereto as Exhibit 302 is a true and correct copy of a faxed memo from Doris Ullman to Mayor Marshall, dated December 11, 2006, attaching a revised proposed Local Law amending the Code of the Village with respect to Wetland Protection, which was previously produced by the Defendants to the Plaintiffs.

304. Attached hereto as Exhibit 303 is a true and correct copy of the Minutes of the Board of Trustees Meeting on November 27, 2006, which was previously produced by the Defendants to the Plaintiffs.

305. Attached hereto as Exhibit 304 is a true and correct copy of the Minutes of the Board of Trustees Meeting on December 18, 2006, which was previously produced by the Defendants to the Plaintiffs.

306. Attached hereto as Exhibit 305 is a true and correct copy of the Affidavit of Wolf Brief, affirmed to January 10, 2008, which was previously submitted by the Plaintiffs to this Court.

307. Attached hereto as Exhibit 306 is a true and correct copy of the Affidavit of Jacob Hershkowitz, affirmed to January 10, 2008, which was previously submitted by the Plaintiffs to this Court.

308. Attached hereto as Exhibit 307 is a true and correct copy of the Affidavit of Meilech Menczer, affirmed to January 10, 2008, which was previously submitted by the Plaintiffs to this Court.

309. Attached hereto as Exhibit 308 is a true and correct copy of the Affidavit of Meir Margulis, affirmed to January 10, 2008, which was previously submitted by the Plaintiffs to this Court.

310. Attached hereto as Exhibit 309 is a true and correct copy of the Defendants' Answer to Second Amended Complaint, filed January 22, 2013, as Document No. 55.

311. Attached hereto as Exhibit 310 is a true and correct copy of the Defendants' Responses to Plaintiffs' Request for Admission, served April 21, 2014.

312. Attached hereto as Exhibit 311 is a true and correct copy of the Defendants' Amended Responses to Certain of Plaintiffs' Second Set of Interrogatories, served December 11, 2013.

313. Attached hereto as Exhibit 312 is a true and correct copy of the Plaintiffs' Second Amended Complaint, filed November 15, 2007, as Document No. 28.

314. Attached hereto as Exhibit 313 is a true and correct copy of a Transcript of a Hearing in this case before the Hon. Kenneth M. Karas, USDJ, on May 20, 2009.

315. Attached hereto as Exhibit 314 is a true and correct copy of the Village of Pomona Code, Chapters 3, 16, 79, 96, 110, 114, 119, 126, 130, as downloaded from the Village of Pomona website at www.pomonavillage.com.

316. Attached hereto as Exhibit 315 is a true and correct copy of Local Law 1 (2007), which was previously marked as Plaintiffs' Exhibit No. 325 at the deposition of Frederick P. Clark Associates on June 20, 2014.

317. Attached hereto as Exhibit 316 is a true and correct copy of Minutes of the Board of Trustees Meeting on November 27, 2006, which was previously produced by the Defendants to the Plaintiffs.

318. Attached hereto as Exhibit 317 is a true and correct copy of a memo dated August 29, 2007, which was previously marked as Plaintiffs' Exhibit No. 457 at the deposition of Nicholas Sanderson on July 31, 2014.

319. Attached hereto as Exhibit 318 is a true and correct copy of an email dated August 16, 2006, which was previously marked as Plaintiffs' Exhibit No. 469 at the deposition of Nicholas Sanderson on July 31, 2014.

320. Attached hereto as Exhibit 319 is a true and correct copy of Minutes of the Board of Trustees Meeting on December 18, 2006, which was previously produced by the Defendants to the Plaintiffs.

321. Attached hereto as Exhibit 320 is a true and correct copy of a Preserve Ramapo email dated January 9, 2007, which was previously marked as Plaintiffs' Exhibit No. 134 at the deposition of Brett Yagel on May 8, 2014.

322. Attached hereto as Exhibit 321 is a true and correct copy of Minutes of the Board of Trustees Meeting on September 25, 2006, which was previously produced by the Defendants to the Plaintiffs.

323. Attached hereto as Exhibit 322 is a true and correct copy of an email dated August 1, 2007, which was previously marked as Plaintiffs' Exhibit No. 254 at the deposition of Lynn Yagel on May 22, 2014.

324. Attached hereto as Exhibit 323 is a true and correct copy of an email dated June 15, 2007, which was previously marked as Plaintiffs' Exhibit No. 528 at the deposition of Nicholas Sanderson on July 31, 2014.

325. Attached hereto as Exhibit 324 is a true and correct copy of a draft Summary Analysis for Recommended Code Modifications, which was previously marked as Plaintiffs' Exhibit No. 327 at the deposition of Frederick P. Clark Associates on June 20, 2014.

326. Attached hereto as Exhibit 325 is a true and correct copy of various form letters, which was previously marked as Plaintiffs' Exhibit No. 186 at the deposition of Brett Yagel on May 8, 2014.

327. Attached hereto as Exhibit 326 is a true and correct copy of the Affidavit of Meilech Menczer, previously submitted in Opposition of Plaintiffs' Motion to Dismiss, dated January 10, 2008.

328. Attached hereto as Exhibit 327 is a true and correct copy of the Affidavit of Jacob Hershkowitz, previously submitted in Opposition of Plaintiffs' Motion to Dismiss, dated January 10, 2008.

329. Attached hereto as Exhibit 328 is a true and correct copy of the Affidavit of Meir Margulis, previously submitted in Opposition of Plaintiffs' Motion to Dismiss, dated January 10, 2008.

330. Attached hereto as Exhibit 329 is a true and correct copy of the Affidavit of Wolf Brief, previously submitted in Opposition of Plaintiffs' Motion to Dismiss, dated January 10, 2008.

331. Attached hereto as Exhibit 330 is a true and correct copy of the Affidavit of David Menczer, previously submitted in Opposition of Plaintiffs' Motion to Dismiss, dated January 10, 2008.


332. Attached hereto as Exhibit 331 is a true and correct copy of the Minutes of a Board of Trustees Meeting on December 18, 2006, which was previously marked as Plaintiffs' Exhibit No. 129 at the deposition of Brett Yagel on May 8, 2014.

333. Attached hereto as Exhibit 332 is a true and correct copy of the Minutes of the Board of Trustees Meeting on November 27, 2006, which was previously produced by the Defendants to the Plaintiffs.

334. Attached hereto as Exhibit 333 is a true and correct copy of the Minutes of the Board of Trustees Meeting, dated February 12, 2007, which was previously marked as Plaintiffs' Exhibit No. 235 at the deposition of Alma Roman on May 16, 2014.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: Nanuet, New York
January 22, 2014



PAUL SAVAD (PS 5358)